## NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

New Jersey Draft Global Warming Response Act Recommendation Report January 14, 2009 Stakeholder Meeting – Land Use and Transportation Planning Summary of discussion and written comments

# **FOCUS QUESTIONS**

- 1. What 2020 or shorter term actions/programs are needed in transportation/land use planning sector that have not yet been recommended?
- 2. What kind of pricing mechanisms should the state consider to incentivize GHG reductions in the transportation sector?
- 3. What approaches should the state employ to consider the carbon impacts from transportation projects?
- 4. What transportation and/or land use planning actions will be the most effective in reducing VMT?
- 5. Do you feel the draft report proposes the appropriate framework to achieve the 2050 GHG limits?
- 6. What specific actions do we need to take now to achieve 2050 limits?

# SUMMARY OF DISCUSSION AND WRITTEN COMMENTS

## **ORAL COMMENTS**

#### Transit

- NJ Transit (NJT) is under-funded, particularly with respect to operating funds.
   Infrastructure is necessary, but we also need funding to support services. Need a dedicated funding source for NJT.
- Reauthorize the NJ's Transportation Trust Fund.
- Construction of the ARC (Access to the Region's Core) tunnel will double rail on 75% of NJ Transit's lines. There is concern that stations will not be able to accommodate the increased demand. Is there a plan? The State should provide aid to municipalities to address this issue.
- State Plan should incorporate transit systems capacities and planning similar to the way water quality management planning defines growth areas.

- Increase State support for vanpooling. NJ provide the least sponsorship among all of the states that support vanpooling.
- Use vanpool pilot projects to evaluate the necessity for bus rapid transit.
- Bus Rapid Transit not always the answer; State should look at vanpools as alternative or complementary strategy.
- Make transit safer and easier. These are important incentive to increase use.
- Perhaps local government should have an increased responsibility for supporting transit
- Provide adequate parking at transit stations and Park & Ride parking lots. Encourage municipalities to do so.

## **VMT** reduction

- Focus employment centers near transit. Promote workforce housing near employment centers.
- Encourage use of NJ Urban Hub Tax Credit program
- Encourage mixed use in <u>all</u> parts of the State; smart growth planning should be extended statewide.
- Promote local government cooperation by using State aid as incentive, e.g., DEP should use RGGI funds to encourage better planning.
- Avoided development also preserves lands sequestration capacity; however, compact development may increase heat island effect that must then be mitigated.
- There are planning tools/calculators that will connect trip-reduction goals with local zoning.
- "Trips generated" is a better measure of land use impacts than VMT).
- PlanSmart has demonstrated trip reduction benefits from mixed-use planning.
- Require towns to provide school buses for children who live close to school.
   Twenty percent of morning traffic is from people dropping children off for school.
- Free parking at high schools encourages commuting rather than use of transit.
- Expand the scope and eligibility of the urban transit hub tax credit.
- Stop projects that will increase VMT, like road widening projects.
- Make urban spaces better to live in. Green space leads to higher quality of life, which is an incentive for urban living.
- Take the BHAG (Big Hairy Audacious Goal) approach. That is, set huge goals. This will drive policies. What is the "free curbside collection" that will put transit at the top of the heap, not the bottom?
- Research shows doubling density in metropolitan periphery more effective than creating TODs in the hub.
- Codify a cap on road expansion for capital budgets.
- Caution compact development exacerbates the heat island effect. Make sure green infrastructure development goes along with high-density planning.

## **Pricing mechanisms**

• HOT lanes are a good source of transit revenue. See the Corzine feasibility assessment in the monetization plan.

- Examine ways to increase the cost of driving.
- Increase the gas tax
- TOD legislation needs to be fixed.
- Implement regional tax sharing
- Change the taxation structure, or Home Rule will never end. For good planning happen, change NJ's tax structure to reduce the dependence on the property tax and thus the ratables chase.
- Transit prices keep increasing, but driving costs (tolls, gas tax) have not.
- TED legislation would have funded transit. Fund TDD legislation.
- Pay-As-You-Drive insurance is bad for business, industry and consulting. Workers who must use their personal vehicles for work (as opposed to for commuting for work) should not be penalized with higher insurance premiums.
- Building on existing land is more expensive than building on new land. So, incentives for redevelopment are needed.
- Enact a sprawl tax.
- Fix the federal Tax Save program. The IRS sets a higher limit for parking than for transit. Lobby to change that.

# **Evaluating carbon impacts from transportation projects**

- Better methods for measuring VMT are needed so success can be measured.
- It is important to take "honest" look at induced travel from projects; projections are frequently underestimates. There are existing models that will evaluate induced travel (e.g. SMITE).
- Increased transit offsets GHG emissions; therefore, the State shouldn't simply look at the GHG emissions from transit.
- In quantifying the value of land use changes, add in the value of open space, including terrestrial sequestration. Do lifecycle analyses.
- Do not include buses in VMT accounting.

## Aligning State, regional and local planning

- The Report should reference the State Development and Redevelopment Plan. The State Plan aligns State and local agencies around a long-term land use vision. If the State Plan is not working, NJ should either abolish the State Plan, replace the SDRP Commission or give it more authority.
- Resolve contradictions in the State Plan that have kept it from being as relevant as it was meant to be.
- Planning should be a cabinet-level function, e.g. within Treasury.
- Direct the State to identify priority growth areas; empower counties to implement these plans; and connect DOT funding to local implementation of regional plans.

# Prioritizing and quantifying

- NJ's use of forthcoming federal funds for capital spending should be prioritized to support smart growth policies and GHG reduction.
- There needs to be a mechanism to align statewide goals and planning at the local planning board level.

- NJ should implement the recommendations of the Permit Efficiency Task Force to encourage and expedite well-located projects.
- Quantify the relationship between land use planning changes and GHG reductions. There are models that can carry out this analysis. Example: attached housing leads to a 15-20% savings on heating costs.
- The State needs to establish method for prioritizing projects
- Prioritize projects. Legislators are looking for guidance regarding where funding for infrastructure and transit should be directed

## **Planning**

- Plan with demographic changes in mind. The Baby Boomers are aging.
- Need an active regional Transfer of Development Rights system
- State Plan should incorporate transit systems capacities and planning similar to the way water quality management planning defines growth areas.
- The recent NJDOT report identified good Transportation Management Association-generated ideas.
- Transportation system evaluation should consider all needs: passenger, freight, recreational, etc.
- The Report is vague with respect to local planning actions. Critical to develop local GHG emission limits so local authorities can relate land use scenarios with resulting GHG emissions.
- Municipal Land Use Law needs overhaul; should have greater focus on regional planning, i.e., amend and strengthen the County Planning Act.
- Put liquefied natural gas infrastructure in place to encourage use of LNG.
- Need better consistency between agencies, e.g., 300 foot buffer along Category 1 stream may not be appropriate in redevelopment areas.
- Take a holistic view of transportation planning, develop one unifying plan, and codify it. We currently have a Statewide Freight Plan, a Strategic Plan, a State Plan, etc
- California program calculates road capacity and assigns that capacity to land uses along that road (a form of TDR).
- Look at the Congestion Busters Task Force Report.

## **Outreach and education**

- Consider tools such as social marketing and education to obtain a "reality check" on current approaches.
- Social marketing can be effective tool.
- Need to change the perception that suburbs are always a better place to live. We must make urban living look "cool".
- If you build it they will come. Infrastructure trumps advertising on NJN.
- We need a slogan, like "reduce, reuse, recycle". Develop the message and use it in marketing.
- Proselytize in the schools. It is free outreach.

#### 2050 Actions

- Achieving the 2050 limit will require encouragement of redevelopment.
- The 90% occupancy target is the least effective recommendation in the report. It is a big unknown. Please define terms. What are the implications will a 90% occupancy target inhibit higher-density development?
- Land use goals should be 2020 provisions, not 2050. Having land use be a cushion rather than one of the three core programs is a bad approach.
- The hierarchy of 2050 actions is unclear is LEV a more important action than transit?

# **Implementation**

- The Office of Climate and Energy should have oversight over agency decisions.
- Add implementation plans for the Land Use/Transportation recommendations. The Report is short on details.
- Establish an expert panel to guide process, including transportation and planning experts.
- Implementation requires strong leadership from the Governor. The Governor should issue an executive order that commits the State to implementing the plan and mandates State agencies to work together to make it happen.
- Include experts on land use planning and transportation planning on the Independent Advisory Panel.

## Other comments

- If we drive development to Pennsylvania (a coal-burning state), we don't solve the GHG problem.
- Create a capacity trading system (see Santa Monica)

# WRITTEN COMMENTS

- Report needs to address the political perception that light rails bring increased population ~ in the past, when mass transit services were cut, people were forced to use their cars, and than once-sensible development (planned around transit) becomes sprawl.
- The automakers should limit what's available for purchase (e.g., they should make bare bones cars, and people can choose options). If a buyer wants cranks or power windows, AC or not, the option and cost should be there. Every powered component of a car adds weight; weight equates to heft; heft equates to larger engines; larger engines consume more gas.
- Have all gas-powered State and Federal vehicles (including US Postal Service vehicles) retrofitted for CNG -- make a hybrid. As part of the State and Federal

conversion, enable public employees who have retrofitted to access CNG at the State/Federal facilities for half price (how do you price it anyway?). Use this as a cost model to show private/commercial enterprises the dollar value of the conversion.

- Use state fleet as a demonstration for PAYD insurance.
- If there is an increase in fuel tax, it should only be for private vehicles, not commercial vehicles.
- The draft report is vague and weak on land use issues, and relies too heavily on emerging technologies in the short term, at the expense of recommending more fundamental land use and transportation reforms.
- Local planning and zoning need to be addressed; municipalities can no longer plan and zone in patterns that are in conflict with established regional and state goals and plans.
- This report has to establish very specific land use guidance. We suggest a table
  that projects the level of reduction that could be anticipated with certain land use
  changes.
- The statement that "New Jersey faces the constant threat of development consuming its remaining open land" is incorrect. Comments provide reasons for this assessment.
- DOT actions need to be much more aggressive in identifying changes to the Access Management Code/Act that would promote smart growth and support the GWRA limits. The Transportation Development District Act has to be amended so that regional transportation plans can be prepared and implemented. Better utilization of DOT's access code powers will provide a tool to shape land-use and allow NJ to meet any of the goals outlined in the report. Also, the State needs to increase funding for Access Management Planning and complete and adopt the Access Code designation of Main Streets in 2009.
- The reports states, "We will create development patterns that increase social equity...." These development patterns need to be described so that everyone knows what they are.
- While the vast majority of development is likely to be redevelopment, 99 percent seems unrealistic.
- The report must give specific guidance on how to align land use and transportation planning with GHG limits. What land use action will achieve a specified GHG limit?
- The report calls for revising the Residential Site Improvement Standards (RSIS) to "encourage infill and denser development forms...." This is not the purpose of RSIS, which is to establish uniform standards for the site improvements needed to support residential development. State planning should be used to promote infill and denser development forms.
- The state, led by NJTransit, should pursue a Capital Cost of Contracting model to strengthen vanpooling efforts throughout the state. Provides information on how and why.
- The GHG plan needs to contain clear acknowledgement for the need to renewal the TTF with additional new capital funding and added funds (preferably a steady,

- reliable funding source) to cover transit operating costs. This issue should be added to the "state legislation" actions in Chapter 6.
- The following transportation principles are not clearly stated in the draft plan:
  - o Transit should be the preferred mode of choice where the market demand exists to support varying levels of service.
  - The reach of transit needs to be met by adopting a true multimodal approach that includes other ridesharing providers, such as Transportation Management Associations, to include in a complimentary way ridesharing, shuttle and other services.
  - O NJ needs to take steps to facilitate the ability of transit vehicles to use the State's highways and streets so they can travel at the posted speed limit at all times seven days a week. This is needed to elevate the attractiveness of transit so it will be the mode of choice.
  - Over a longer time frame, steps are needed by a wide range of agencies and at different levels of government to encourage new development to be built in clusters such that they are transit accessible and friendly.
- 2020 recommendation "Maintain existing mass transit infrastructure and expand system capacity" needs to acknowledge that aside from maintaining and expanding system capacity, this strategy assumes implementation of transportation pricing such that transit use is encouraged. Also note that the 145 million number in that recommendation includes the PATCO extension project, growth in PATCO and NJ transit, PATCO, and Private Carrier Buses that NJ TRANSIT supports with vehicles, it does not include PATH, Private Ferries, Access Link and Private Bus Services to Atlantic City.
- NJ Transit should be specifically listed as a relevant agency in the several 2020 recommendations"
- HOV lanes references should be broadened to include potential for "new" HOT Lanes or HOV/HOT treatment where significant transit and ridesharing services exist or are possible and are significantly restricted because of chronic congestion
- Freight rail initiatives need to be coordinated with NJ Transit to consider their impact on commuter rail service.
- If incentives are used to achieve the development/redevelopment land use targets, NJ Transit should have an active role in decisions on where incentives will be used, and it is important to note that simple spatial relationships and density targets do not guarantee an environment where transit will thrive.
- Goal that "All New Jerseyans will have alternative transportation options to go to
  work beyond single occupancy vehicles (SOVs)" is likely not attainable, given the
  inefficient high costs this goal. In low density areas such as the Pinelands and
  parts of the Highlands, even carpooling may be difficult. Should be reduced from
  100 %, i.e. 95%, still very high but acknowledging that some areas just cannot be
  served efficiently.
- It may simply be cost prohibitive and unnecessary to make **all** spaces capable of recharging electric vehicles, especially considering that other efficient vehicles such as hydrogen fuel cells and hybrids will also be in common use. A smaller percentage goal would be more efficient and the number of charging stations could be expanded over time if the demand grows to the supply.

- The report is understandably light on implementation plans. In addition, the state should identify specific timelines/target dates and standards/reporting requirements for particular actions. We understand that specific implementation plans are forthcoming, and look forward to working with the state to develop these plans and/or review them when they are available.
- NJTPA has analyzed a series of Transportation Clean Air Measures (TCAMs), and for a short list of nine, has drafted "action plans" that discuss implementation issues. Some of the actions mentioned in the report were also included in the nine selected TCAMs (private truck idle reduction facilities and education/awareness; trip/VMT reduction programs; and traffic signal coordination programs). TCAMs not specifically mentioned in the report include education and awareness programs to reduce passenger car and school bus idling; efforts to reduce diesel locomotive idling, for both NJ Transit passenger locomotives and private freight locomotives; and NJDOT construction contract stipulations for off-road vehicles and equipment. These action plans may be of use to the state in developing its own implementation plans. In addition, the state may want to consider incorporating additional TCAM measures into its recommendations.
- An additional research topic to consider is research on potential "unintended consequences" of the proposed actions.
- The report should include a discussion, as part of the "federal recommendations" in Chapter 6, of how spending a greater proportion of funds on transit rather than highways might affect the availability of federal transportation dollars.
- The report could include further guidance on how its recommendations might be given more "teeth" (e.g., mandatory vs. voluntary).
- If the GWRA provides consequences for not meeting the required GHG emission reduction targets (beyond those caused by global warming itself), this should be noted (e.g., the final report may want to address include whether the public can sue the State under this Act if targets are not met, and if individual recommended programs (in particular, the LEV program) have any mandates with the force of penalties).
- Compact living is not only conducive to non-auto commuting, but also contributes to shorter auto trips and a host of environmental and socio-economic benefits
- The report should use the term "energy" consistently. The Energy Master Plan dealt only with heating and electricity, but as the report points out, "the transportation sector...is responsible for 30 percent of the State's energy consumption." Yet the report also states, for example, that transportation and "energy" are the largest and second largest contributors to the state's GHG emissions. It would be clearer to state that "heating/electricity" is the second largest contributor.
- The report makes commitment is made to the state "lead[ing] by example". It should be made clear that this encompasses all state bodies, including agencies, commissions, authorities, colleges and universities, and the state should develop standards and reporting requirements (along with possible penalties and/or rewards/incentives) to be used by these state bodies. This depth of commitment across all state bodies should also apply to specific strategies, such as "greening" the state fleet. In addition, the state should investigate possible incentives and/or

- mandates for state contracts, especially in the era of increased government reliance on outside contractors and consultants. (
- The report should note that promoting ZEV (particularly electric vehicle) use must occur in concert with greening the electricity source.
- The quality and safety of transit stops, as well as the availability of park-and-ride spaces, can encourage or discourage transit use.
- Methods to analyze carbon footprints from large transportation projects must be robust and flexible to allow their application at various stages of the transportation planning process, from comparing various "strategies" aimed at solving a particular transportation problem, to comparing various alternatives for a particular project. As such, it needs to consider various scales of analysis and data availability. In addition, the method needs to be designed to accommodate the other mandates and priorities of the entity conducting the analysis.
- In addition to the "Urban Transit Hub" program, there is a need to consider developing a "suburban" or "regional center" transit hub program to encourage businesses to locate near suburban transit stations, and to examine possible shuttle services to serve these businesses.
- The report should describe how the specific corridors listed in the "Green Corridors" demonstration project were selected.
- The HOT lane recommendation should not be limited to "maximizing the efficiency of underutilized HOV lanes," as there are so few HOV lanes in the state, but also consider the feasibility and implications of converting existing unrestricted lanes to HOT lanes and/or addition of new HOT lanes.
- Regarding potential fuel-efficient vehicle incentive programs, note that incentives for low-carbon <u>behaviors</u> (and disincentives for high-carbon behaviors) should be explored as well as incentives for low-carbon vehicles. This can be tied to ecodriving education measures identified in the Plan.
- There does not seem to be any clear statement of what kind of pricing mechanisms are being considered. Does this include increasing the gas tax? If so, it should be stated explicitly. In addition, the state needs to provide next steps and timeframe for evaluating pricing mechanisms, including HOT lanes, congestion pricing and pay-as-you-drive insurance, among others.
- The state should consider promoting measures to reduce idling of other vehicles, including school buses, school and transit drop-off/pick-ups, drive-through and drive-up users. The State should strengthen the idling commitment stated in the *Report's* 2020 Supporting Recommendations for reduction of truck idling by adding specific numerical goals. Also look beyond trucks by enforcing anti-idling laws for all vehicles, and provide public education about idling.
- The section on rail shuttle projects should include discussion and consideration of
  potential local issues, including those relating to at-grade crossings, re-use of
  abandoned rail corridors, conflicts with passenger service, and increased use of
  existing under-utilized freight rail corridors.
- The report should note that achieving the 2050 limit will require significant changes in local land use planning in addition to changes in long-term infrastructure investment.

- The "land use planning and transportation" 2050 strategies should address several issues, including:
  - Limiting VMT growth to 1% per year should not come at the expense of economic growth. The challenge is to limit VMT growth while still supporting desired economic growth.
  - o Is the goal to have <u>every mile traveled</u> in New Jersey be "green" within the next 15 years, or just the "average" mile traveled? If every single vehicle is green, then the average will be much higher than that, but this will be difficult to reach. The goal should be clarified.
  - What is the time frame for the development goals? By what year should 90% of new development be in existing infrastructure areas?
  - o In regards to the building occupancy goal, how will this apply to existing suburban "campus"-type offices that may not be suitable for the new smart-growth paradigm?
  - In addition to considering the need for adaptation, there should be a consideration of prioritization of land use and transportation investments based on how they consider adaptation and how necessary they are to an adaptation plan.
- The report discusses a limit on transportation sector GHG emissions of approximately 40 MMT. Consideration should be given as to how this limit is applied on a spatial basis across the state, using indicators such as population density, road connectivity, the availability of transit options, etc.)
- If it is clear that a specific limit needs to be placed on GHG emissions from the transportation sector, what other "specific mechanisms" are being considered? How would these GHG limit be enforced on the transportation sector?
- There should be consideration that if travel is truly free and easy, then there very well may be induced travel that is being discouraged by this plan.
- Consideration should be given to how increase the price on inefficient travel might impact low-income residents who have no other options to inefficient travel modes.
- The state should consider incorporating the "developed density" for analyzing growth into the report.
- While its important to consider GHG emissions in its transportation plans, this is not currently a mandate from the federal funding agencies. This may change as new federal legislation is developed.
- There are several adaptation issues relating to the transportation system, including the impacts on evacuation planning, increased wear on pavement and buckling of rails from excessively hot temperatures, reduced clearance under bridges due to sea level rise, and potential flooding of low-lying transportation infrastructure (including roadways, tunnels, rails, port facilities, and runways).
- The statement that New Jersey ranks 45<sup>th</sup> in the nation for per capita VMT (p. 108) seems to be in stark contrast to the statement that NJ is 17<sup>th</sup> in the nation for per capita transportation petroleum usage (p. 110). If these two statistics are indeed accurate, a discussion of how per capita transportation petroleum can be much higher than average while per capita VMT remains relatively low is warranted.

- Tailpipe measures relied upon in the report will not achieve the GWRA goals by themselves, especially in the face of contradictory state actions like the expansions of the Garden State Parkway and the New Jersey Turnpike. Instead, the state must halt expansion of the New Jersey Turnpike and the Garden State Parkway that threaten to undermine the GWRA goals.
- Near-term goals need to include the development of methodologies to quantify impacts of VMT reduction measures and establish targets and an action plan to reduce VMT growth to 1% or less annually. This can include adopting a handful of additional measurable targets that will help ensure progress towards the VMT target, such as for the number of residents and employees near transit stops, the frequency of transit service, and the amount of new sprawl development. Comments include specific comments on what these methodologies, measures, targets and action plans should include.
- The NJDOT should take the following actions to meet VMT reduction goals:
  - o Develop and implement an effective methodology for measuring vehicle travel.
  - o Working with DEP and other state agencies to create an action plan to meet or exceed the VMT targets.
  - o Include land use projects, not just car related programs, in the transportation-related demonstration projects.
- Remove demonstration projects that are not appropriate for meeting the goals of the GWRA. For example, the NJ Turnpike Authority "Clean and Green Corridor" Program is a farce, given the State's current plans to widen the Turnpike by six lanes.
- All so-called "supporting recommendations" must be prioritized with a higher level of specificity and have a concrete timeline for their implementation. Priorities should be based on: 1) greatest return on investment; 2) Ease and speed of implementation; and 3) Strategic importance to long-term goals. It is imperative that other measures, such as reduction in VMT statewide, accompany the 2020 core measures from the start if the benchmark goals are to be achieved.
- Given the uncertain nature of both alternative fuel and electric car technologies, it
  is premature to rely on ZEVs to provide any more than aspirational emissions
  reductions.
- Fully implement and officially codify Complete Streets policies to help solidify the necessary "paradigm shift" within DOT.
- Ecodriving should not be emphasized as an integral component of the 2020 recommendations.
- Add targets and timeframes for NJDOT's work with Transit Villages, and expand this program.
- It is unclear how and why NJ Transit's plans to work with five communities on Transit Oriented Development is separate from the Transit Village Initiative, and with the scarcity of funding, DOT needs to guarantee that new efforts will not detract funding from existing programs.
- Dedicate capital funds to implement corridor plans developed through NJFIT.

- Amend the Municipal Land Use Law, N.J.S.A. 40:55D 1 *et seq.*, to require circulation elements in all master plans, and to more clearly authorize the use of tools such as mandatory clustering and lot-size averaging.
- Restrict state employment incentive programs to areas served by transit.
- Consider proposing a bill similar to California's Senate Bill 375.
- Ensure transportation spending requirements conform with and support the GWRA report recommendations. Specific examples are provided in the detailed comments.
- Ensure environmental review requirements conform with and support the GWRA report recommendations.
- Include a more detailed discussion on expansion of freight rail. Specific examples are provided in the detailed comments.
- DEP should dedicate 10% of its share of the RGGI proceeds reserved for municipal assistance for the planning grant portion of the Smart Housing Incentives program.
- Name members to advisory committee, including experts in land use and transportation planning, as well as public members, as soon as practicable.
- Recommend the participation of additional relevant state agencies, including the State Planning Commission (SPC) and Office of Smart Growth (OSG), assign duties in line with the goals of the GWRA.
- Provide smart growth strategy training for planning and zoning board members.
- Clearly define each initiative and enforcement measures to accompany each by codifying and formally adopting GWRA policies. Without statutory enforcement of progressive policies, the GWRA will remain a suggestion, and its goals will fall to the wayside as administrations and commissioners come and go.
- All discretionary spending programs need to conform to GWRA goals. State
  departments and agencies must use a combination of incentive and penalty to
  create a tangible "paradigm shift."
- Are we utilizing the DOT Alternative Fuels and Data Center? Other states have tried programs and the one which would have the most impact on NJ would be the electrical car stations.
- Report needs to define "Response Principles" for decision making.
- Report needs a "Continuing Planning Process" Section that is periodically revisited to adjust approaches, goals and objectives.
- Consider the creation of an overarching vision statement.
- The Department should establish a web-based clearing house for research information developed as part of the greenhouse gas response in New Jersey and elsewhere.
- Specifically with respect to the SDRP and the OSG:
  - Elevate the Office of Smart Growth to a cabinet level position with direct oversight by the Governor OR to an "in but not of" position within the relatively neutral Treasury Department.
  - o Incorporate the land use components of the Global Warming Response Act Report into the new version of the SDRP.
  - o Fill the Commission's vacant seats.

- o Through amendments to the State Planning Act, clarify the powers of the State Planning Commission to help the Governor align state agency actions (capital spending, rule-making) with the State Plan.
- Once properly equipped, charge the SPC with:
  - Working with DEP and DOT to identify desired land use patterns (including densities and uses) and strategies that will meet the GHG reduction goals, and are suitable for their context, based on national research. Complete in 2009.
  - o Apportioning the target down to the county (or, in the case of the State's three special management areas, regional) level.
  - o Pilot the regional planning effort above in a region or county that completes its WQMP process and which has strong staff capacity.
  - Require municipalities to conform their land use plans and zoning to the county plans.
- While the commenter supports the proposed 1 percent limit on growth in VMT between now and 2020, it's also important to recognize that automobile transportation still requires carbon-intensive activities such as road repair, tire manufacturing, and parking lot construction, it is essential that we take cars off the road.
- The State should explore:
  - Community or corporate-sponsored jitneys to transport people to trains and buses, removing the need for bigger parking lots at train stations and reducing the VMTs and idling involved with delivering and picking up transit riders;
  - Incentives and resources to help companies embrace more use of homebased workers;
  - No-car zones in urban centers, similar to the August 2008 Summer Streets program in NYC;
  - o Community car sharing programs like ZipCar or FlexCar that make it easy for people in developed communities to eschew car ownership;
  - O Bike sharing programs like the one in Washington, DC, that make it easy for people to bike instead of drive, even if they don't own or want to buy a bicycle;
  - Encouraging flexibility in policies that currently provide school bus transportation only to students traveling more than two miles to school;
     and
  - o Freezing transit fare increases by diverting funds that would have been spent on new highway construction and road widening.
- Ensure that the potential carbon reduction resulting from HOT lanes and expanded emergency service patrols is cost-competitive with other carbon cutting investments.
- Investigate "cash-for-clunkers" programs for larger or older vehicles.
- Support the Smart Housing Incentives Act (A3632/S2505).
- Amend the Residential Site Improvement Standards to provide the flexibility needed for compact, pedestrian-friendly infill development and redevelopment, without compromising environmental outcomes. (

- Add new conditions to Garden State Preservation Trust (GSPT) grants to local governments to discourage sprawl development. Comments provide details on what to include.
- Amend the Transfer of Development Rights Act to simplify the process and encourage greater municipal participation.
- DEP should develop a new rule to protect habitat for threatened and endangered species in septic areas and pilot it in a single county.
- Direct federal stimulus funds to stimulate the economy in the short-term, while positioning New Jersey for long-term environmental and economic sustainability.
- Use the reconstruction of the Route 29 boulevard in Trenton to demonstrate how strategic investments can catalyze urban revitalization with sustainable development patterns that reduce greenhouse gas emissions.
- Incorporate a target for the expansion of the transit ridership in the GWRA Report and use those targets to drive spending decisions.
- Establish a means for evaluating transportation spending on the basis of its impact on greenhouse gas emissions.
- Implement a system-wide rollback of unbuilt "desirable typical sections" to reduce expectations that large highways will solve congestion, and to change municipal expectations about potential for sprawl development.
- Increase resources for planning assistance to local governments.
- Enhance Commuter Options and Green Commuting Program by doubling existing funding.